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June 03, 2003

Mr. Gary Lenz, APC Engineer
PA Department of Environmental Protection
Bureau of Air Quality
909 Elmertown Avenue
Harrisburg, PA 17110-8200

Reference: Natural Minor Permit No. 36-03033
Five (5) RFD Exemption Requests for Department Sources

Dear Mr. Lenz:

We wish to submit the enclosed Request for Determination (RFD) Forms to address the operation of five (5) separate departments in our facility, all of which have process exhausts that contain insignificant or de minimus quantities of emissions. Each of the 5 enclosed RFD's seeks the Department's consideration of an exemption for the Source's actual emissions which we have quantified.

Please call me if you have any questions on this filing.

Very truly yours,

Rick Daniels
Rick Daniels
Manager, Maintenance

Enclosures: RFD #3.1: Metal Finishing (1 copy)
RFD #3.2: Chemistry Laboratory (1 copy)
RFD #3.3: PCBA 1 (1 copy)
RFD #3.4: PCBA 2 (1 copy)
RFD #3.5: 762 Line (1 copy)

Bulova\DEP Ltr-5 RFDs0602

Finishing



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY

**Request for Determination of Requirement
for Plan Approval/Operating Permit (RFD)**

(Submit in Triplicate)

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A. Application is being made for: *[please mark the appropriate case(s)]*

☒ Exemption from Plan Approval

☐ Exemption from Operating Permit

Physical Changes of Minor Significance

☒ Changes Do Not Add New Equipment (See 25 Pa. Code § 127.14(c)(1)). Physical changes of minor significance must not violate the terms of an operating permit, the Pennsylvania Air Pollution Control Act (APCA), the Clean Air Act or regulations adopted thereunder. In addition, these changes can not result in emission increases above the emissions allowable in the operating permit or result in an increased ambient air quality impact for an air contaminant. Changes may be made within seven (7) days after the Department's receipt of a written request unless the Department requests additional information or objects to the changes.

☐ Changes Add New Equipment (See 25 Pa. Code § 127.14(c)(2)). Physical changes of minor significance must not violate the terms of an operating permit, the APCA, the Clean Air Act or regulations thereunder. In addition, these changes, which add new equipment, cannot result in emission increases above the emissions allowable in the operating permit or result in an increased ambient air quality impact for an air contaminant. Changes can be made within 15 days after the Department's receipt of a written request unless the Department requests additional information or objects to the changes.

B. Narrative Source Description (Include: process description, control device, exhaust volume, stack data, schematic flow diagram, material data safety sheet and any other pertinent information - attach additional sheets as needed):

RFD #3.1: Metal Finishing Department (Metal Finishing Processes, Conformal Coating, Small Scale Cleaning, and Lubricating Processes)

C. Facility Name
Bulova Technologies, L.L.C.

Plant Name:
Bulova Technologies, L.L.C.

D. Mailing Address:
101 North Queen Street, Lancaster, PA 17604

E. Contact Person:
Rick Daniels

Title:
Manager, Maintenance

F. Telephone Number:
717/299-2581, Ext. 2508

G. Federal ID #
23-2793455

H. Current Operating Permit No., if any:
Natural Minor No. 36-03033

I. Date of Installation:
1981

J. Location of Source(s):
1 of 5 Departmental Sources located within the facility at 101 North Queen Street, Lancaster, PA 17604

K. Municipality/Township:
City of Lancaster

County
Lancaster

I, Rick Daniels, certify under penalty of law as provided in 18 Pa. C. S.A. § 4904 and 35 P.S. § 4009(b)(2), that based on information and belief formed after reasonable inquiry, the statements and information contained in this form are true, accurate and complete.

(Signed)

Rick Daniels

Date:

6/3/03

Name (typed) Rick Daniels

Title: Manager, Maintenance

L. Estimated Emissions (Attach calculations and basis for estimated emissions):
Based on 2002 ACTUAL CONSUMPTIONS:

Pollutant(s)	Emissions (lbs/year)	Emissions (tons/year)
Mixed Acid Gases	#29.9	#0.015
Mixed VOC's	#1,764	#0.882

M. List all source(s) exempted from permitting within last five years. This listing should include sources that were exempted under a Request for Determination for Plan Approval/Operating Permit (RFD).

Source	Date Installed	Department Determination, if any
RFD #1: Conformal Coating Process – Relocate & Exhaust to Scrubber	3/98	DEP Exempted – 3/98
RFD #2: Phillips CB Assembly – Soldering Exhaust to Scrubber	3/15/01	DEP Exempted 2/2/01

N. Will the construction or modification of the source covered under this RFD increase emissions from other sources at the facility? ☐ Yes ☒ No

If yes, describe and quantify emission increases on separate sheet(s).

Will the construction or modification of the source be subject to 25 Pa. Code, Subchapter E, New Source Review (NSR) requirements or Prevention of Significant Deterioration (PSD) of Air Quality regulations?

☐ Yes ☒ No

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Date Received:

6/4/03

Reviewed By:

Gary Lenz

☒ A plan approval is not required for this source. (See 25 Pa. Code § 127.4(a)(1)-(9)).

☒ An operating permit is not required for this source. (See 25 Pa. Code § 127.443 a)).

☐ The source(s) do(es) not qualify for exemption. Applicant is required to submit a plan approval and/or operating permit application.

Signature

Ronald Davis

Name and Title

Ronald Davis, Chief NSR Section

Date

6/6/03

Remarks:

Laboratory



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
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B. Narrative Source Description (Include: process description, control device, exhaust volume, stack data, schematic flow diagram, material data safety sheet and any other pertinent information - attach additional sheets as needed):

RFD #3.2: Chemistry Laboratory (Metal Finishing Processes and Small Scale Cleaning)

C. Facility Name
Bulova Technologies, L.L.C.

Plant Name:
Bulova Technologies, L.L.C.

D. Mailing Address:
101 North Queen Street, Lancaster, PA 17604

E. Contact Person:
Rick Daniels

Title:
Manager, Maintenance

F. Telephone Number:
717/299-2581, Ext. 2508

G. Federal ID #
23-2793455

H. Current Operating Permit No., if any:
Natural Minor No. 36-03033

I. Date of Installation:
1981

J. Location of Source(s):
1 of 5 Departmental Sources located within the facility at 101 North Queen Street, Lancaster, PA 17604

K. Municipality/Township:
City of Lancaster

County
Lancaster

I, Rick Daniels, certify under penalty of law as provided in 18 Pa. C. S.A. § 4904 and 35 P.S. § 4009(b)(2), that based on information and belief formed after reasonable inquiry, the statements and information contained in this form are true, accurate and complete.

(Signed) Rick Daniels

Date: 6/3/03

Name (typed) Rick Daniels

Title: Manager, Maintenance

L. Estimated Emissions (Attach calculations and basis for estimated emissions):
Based on 2002 ACTUAL CONSUMPTIONS:

Pollutant(s)	Emissions (lbs/year)	Emissions (tons/year)
Mixed Acid Gases	#16.1	#0.008
Mixed VOC's	#952	#0.476

M. List all source(s) exempted from permitting within last five years. This listing should include sources that were exempted under a Request for Determination for Plan Approval/Operating Permit (RFD).

Source	Date Installed	Department Determination, if any
RFD #1: Conformal Coating Process – Relocate & Exhaust to Scrubber	3/98	DEP Exempted – 3/98
RFD #2: Phillips CB Assembly – Soldering Exhaust to Scrubber	3/15/01	DEP Exempted 2/2/01

N. Will the construction or modification of the source covered under this RFD increase emissions from other sources at the facility? ☐ Yes ☒ No

If yes, describe and quantify emission increases on separate sheet(s).

Will the construction or modification of the source be subject to 25 Pa. Code, Subchapter E, New Source Review (NSR) requirements or Prevention of Significant Deterioration (PSD) of Air Quality regulations?

☐ Yes ☒ No

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Reviewed By: Gary Lenz

☒ A plan approval is not required for this source. (See 25 Pa. Code § 127.14(a)(1)-(9)).

☒ An operating permit is not required for this source. (See 25 Pa. Code § 127.443 (a)).

☐ The source(s) do(es) not qualify for exemption. Applicant is required to submit a plan approval and/or operating permit application.

Ronald Davis
Signature

Ronald Davis, Chief, Emissions
Name and Title

Date 6/4/03

Remarks:



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B. Narrative Source Description (Include: process description, control device, exhaust volume, stack data, schematic flow diagram, material data safety sheet and any other pertinent information - attach additional sheets as needed):

RFD #3.3: Printed Circuit Board A 1 (Soldering Operations)

C. Facility Name
Bulova Technologies, L.L.C.

Plant Name:
Bulova Technologies, L.L.C.

D. Mailing Address:
101 North Queen Street, Lancaster, PA 17604

E. Contact Person:
Rick Daniels

Title:
Manager, Maintenance

F. Telephone Number:
717/299-2581, Ext. 2508

G. Federal ID #
23-2793455

H. Current Operating Permit No., if any:
Natural Minor No. 36-03033

I. Date of Installation:
1981

J. Location of Source(s):
1 of 5 Departmental Sources located within the facility at 101 North Queen Street, Lancaster, PA 17604

K. Municipality/Township:
City of Lancaster

County
Lancaster

I, Rick Daniels, certify under penalty of law as provided in 18 Pa. C. S.A. § 4904 and 35 P.S. § 4009(b)(2), that based on information and belief formed after reasonable inquiry, the statements and information contained in this form are true, accurate and complete.

(Signed) Rick Daniels

Date: 6/3/03

Name (typed) Rick Daniels

Title: Manager, Maintenance

L. Estimated Emissions (Attach calculations and basis for estimated emissions):
Based on 2002 ACTUAL CONSUMPTIONS:

Pollutant(s)	Emissions (lbs/year)	Emissions (tons/year)
PM ₁₀	#25	#0.0125
Lead (Pb)	#8.35	#0.0042

M. List all source(s) exempted from permitting within last five years. This listing should include sources that were exempted under a Request for Determination for Plan Approval/Operating Permit (RFD).

Source	Date Installed	Department Determination, if any
RFD #1: Conformal Coating Process - Relocate & Exhaust to Scrubber	3/98	DEP Exempted - 3/98
RFD #2: Phillips CB Assembly - Soldering Exhaust to Scrubber	3/15/01	DEP Exempted 2/2/01

N. Will the construction or modification of the source covered under this RFD increase emissions from other sources at the facility? ☐ Yes ☒ No

If yes, describe and quantify emission increases on separate sheet(s).

Will the construction or modification of the source be subject to 25 Pa. Code, Subchapter E, New Source Review (NSR) requirements or Prevention of Significant Deterioration (PSD) of Air Quality regulations?

☐ Yes ☒ No

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☒ A plan approval is not required for this source. (See 25 Pa. Code § 127.14(a)(1)-(9))

☒ An operating permit is not required for this source. (See 25 Pa. Code § 127.443(a))

☐ The source(s) do(es) not qualify for exemption. Applicant is required to submit a plan approval and/or operating permit application

Ronald Davis
Signature

Ronald Davis, ch of NSR section
Name and Title

6/6/03
Date

Remarks:



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B. Narrative Source Description (Include: process description, control device, exhaust volume, stack data, schematic flow diagram, material data safety sheet and any other pertinent information - attach additional sheets as needed):

RFD #3.4: Printed Circuit Board A 2 (Soldering Operations)

C. Facility Name
Bulova Technologies, L.L.C.

Plant Name:
Bulova Technologies, L.L.C.

D. Mailing Address:
101 North Queen Street, Lancaster, PA 17604

E. Contact Person:
Rick Daniels

Title:
Manager, Maintenance

F. Telephone Number:
717/299-2581, Ext. 2508

G. Federal ID #
23-2793455

H. Current Operating Permit No., if any:
Natural Minor No. 36-03033

I. Date of Installation:
1981

J. Location of Source(s):
1 of 5 Departmental Sources located within the facility at 101 North Queen Street, Lancaster, PA 17604

K. Municipality/Township:
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County
Lancaster

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(Signed)

Rick Daniels

Date:

6/3/03

Name (typed) Rick Daniels

Title: Manager, Maintenance

L. Estimated Emissions (Attach calculations and basis for estimated emissions):
Based on 2002 ACTUAL CONSUMPTIONS:

Pollutant(s)	Emissions (lbs/year)	Emissions (tons/year)
PM ₁₀	#25	#0.0125
Lead (Pb)	#8.35	#0.0042

M. List all source(s) exempted from permitting within last five years. This listing should include sources that were exempted under a Request for Determination for Plan Approval/Operating Permit (RFD).

Source	Date Installed	Department Determination, if any
RFD #1: Conformal Coating Process - Relocate & Exhaust to Scrubber	3/98	DEP Exempted - 3/98
RFD #2: Phillips CB Assembly - Soldering Exhaust to Scrubber	3/15/01	DEP Exempted 2/2/01

N. Will the construction or modification of the source covered under this RFD increase emissions from other sources at the facility? ☐ Yes ☒ No

If yes, describe and quantify emission increases on separate sheet(s).

Will the construction or modification of the source be subject to 25 Pa. Code, Subchapter E, New Source Review (NSR) requirements or Prevention of Significant Deterioration (PSD) of Air Quality regulations?

☐ Yes ☒ No

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☐ The source(s) do(es) not qualify for exemption. Applicant is required to submit a plan approval and/or operating permit application.

Bonnie Davis
Signature

Bonnie Davis, Chief WSR Section
Name and Title

6/6/03
Date

Remarks:

Line



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
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B. Narrative Source Description (Include: process description, control device, exhaust volume, stack data, schematic flow diagram, material data safety sheet and any other pertinent information - attach additional sheets as needed):

RFD #3.5: 762 Line (Packaging/Stenciling/Sealing/Gluing/Bonding)

C. Facility Name
Bulova Technologies, L.L.C.

Plant Name:
Bulova Technologies, L.L.C.

D. Mailing Address:
101 North Queen Street, Lancaster, PA 17604

E. Contact Person:
Rick Daniels

Title:
Manager, Maintenance

F. Telephone Number:
717/299-2581, Ext. 2508

G. Federal ID #
23-2793455

H. Current Operating Permit No., if any:
Natural Minor No. 36-03033

I. Date of Installation:
1981

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1 of 5 Departmental Sources located within the facility at 101 North Queen Street, Lancaster, PA 17604

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(Signed) *Rick Daniels*

Date: 6/3/03

Name (typed) Rick Daniels

Title: Manager, Maintenance

L. Estimated Emissions (Attach calculations and basis for estimated emissions):
Based on 2002 ACTUAL CONSUMPTIONS:

Pollutant(s)	Emissions (lbs/year)	Emissions (tons/year)
Mixed VOC's	#84	#0.042

M. List all source(s) exempted from permitting within last five years. This listing should include sources that were exempted under a Request for Determination for Plan Approval/Operating Permit (RFD).

Source	Date Installed	Department Determination, if any
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Ronald Davis
Signature

Ronald Davis, Chief NSR Section
Name and Title

6/6/03
Date

Remarks: